

F I L E D  
Clerk  
District Court

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AUG 30 2005  
For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

5 Attorneys for Plaintiffs Elenita A. Santos and Angel C. Santos

6  
7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN MARIANA ISLANDS

9 ELENITA A. SANTOS and ) CIVIL CASE NO. 04-0030  
10 ANGEL C. SANTOS, )  
11 Plaintiffs, )  
12 vs. ) PLAINTIFFS' SUPPLEMENTED  
13 ) DISCLOSURE STATEMENT  
14 HONGKONG ENTERTAINMENT )  
15 (OVERSEAS) INVESTMENTS LIMITED )  
16 dba TINIAN DYNASTY HOTEL & )  
17 CASINO, and CENTURY INSURANCE )  
CO. LIMITED, )  
18 Defendants. )

19 Plaintiffs, by and through their attorneys, pursuant to L.R. 16.2(c)(J)(d) and  
20 Fed.R.Civ.Pro. Rule 26(a), submit the following disclosures:

21 A. Persons With Potentially Discoverable Information

	<u>Name/Address</u>	<u>Subject Of Information</u>
24 1.	Dr. Jerome Unatin South Bay Orthopaedic Specialists Medical Center 23560 Crenshaw Blvd., Suite 102 Torrance, CA 90505 Tel. No. (310) 784-2355	Treatment of the injuries Mrs. Santos sustained from her fall on Defendant's stairs.

ORIGINAL

1                   2. Dr. Durgesh G. Nagarkatti                   Treatment of the injuries Mrs. Santos  
 2                   280 Pale San Vitores Rd.                   sustained from her fall on Defendant's  
 3                   Tamuning, Guam 96913                   stairs.  
 4                   Tel. No. (671) 647-4542

5                   3. Dr. Florencio Lizama                   Treatment of the injuries Mrs. Santos  
 6                   241 Farenholt Avenue, Suite 204                   sustained from her fall on Defendant's  
 7                   Tamuning, Guam 96911-0000                   stairs.  
 8                   Tel. No. (671) 649-8698

9                   4. Dr. Marina Raikhel                   Treatment of the injuries Mrs. Santos  
 10                  3640 W. Lomita Blvd., Suite 205                   sustained from her fall on Defendant's  
 11                  Torrance, CA 90505-3927                   stairs.  
 12                  Tel. No. (310) 373-8120

13                  5. Dr. Thomas M. Austin                   Treatment of the injuries Mrs. Santos  
 14                  Commonwealth Health Center                   sustained from her fall on Defendant's  
 15                  Navy Hill Road,                                   stairs.  
 16                  P.O. Box 500409 CK  
 17                  Saipan, MP 96950  
 18                  Tel. No. (670) 234-8950 ext. 2930

19                  6. Guam Nursing Services                   Provided care and rehabilitative services to  
 20                  PMB 472 Rte 8 #16-71                   Mrs. Santos stemming from her fall on  
 21                  Maite, Guam 96927                   Defendant's stairs.  
 22                  Tel. No. (671) 649-2815

23                  7. Elenita A. Santos                   Knowledge of: the fall on Defendant's  
 24                  11940 Candor Street                   stairs, the medical treatment received,  
 25                  Cerritos, CA 90703                   the pain and suffering, complications  
 26                  Tel. No. (562) 653-9714                   arising from the injury and medical  
 27                  Treatment, limitations on activity,  
 28                  emotional/psychological consequence  
 29                  resulting from the injury.

30                  8. Joseph A. Santos                   Knowledge of: the fall on Defendant's  
 31                  c/o counsel for Plaintiffs                   stairs, the medical treatment received,  
 32                  the pain and suffering, complications  
 33                  arising from the injury and medical  
 34                  Treatment, limitations on activity,  
 35                  emotional/psychological consequence  
 36                  resulting from the injury.

37                  9. Elenita and Angel Santos                   Knowledge of: the fall on Defendant's  
 38                  c/o counsel for Plaintiffs                   stairs, the medical treatment received,  
 39                  the pain and suffering, complications arising  
 40                  from the injury and medical treatment,

limitations on activity,  
emotional/psychological consequence  
resulting from the injury.

10. Dora Taco  
c/o counsel for Plaintiffs

Knowledge of: the fall on Defendant's stairs, the medical treatment received, the pain and suffering, complications arising from the injury and medical treatment, limitations on activity, emotional/psychological consequence resulting from the injury.

11. Elaine A. Santos, and  
her husband Tom  
4263 Havenridge Drive  
Corona, CA 92883  
Tel. No. (951) 737-7588

Knowledge of: the fall on Defendant's stairs, the medical treatment received, the pain and suffering, complications arising from the injury and medical treatment, limitations on activity, emotional/psychological consequence resulting from the injury.

12. Melissa A. Santos  
11940 Candor Street  
Cerritos, CA 90703  
Tel No. (562) 653-9714

Knowledge of: the fall on Defendant's stairs, the medical treatment received, the pain and suffering, complications arising from the injury and medical treatment, limitations on activity, emotional/psychological consequence resulting from the injury.

13. Gus Desolua, Agent in Charge  
Tinian Health Center(THC)

Dispatched emergency team to Defendant's place of business in order to transport Plaintiff to CHC. Has knowledge of Plaintiff's physical condition, including pain/suffering immediately after the incident.

14. Tinian Police Dept.  
Tinian Dept. of Public Safety  
(DPS)

Dispatched officers to defendant's place of business in order to transport Mrs. Santos to CHC. Has knowledge of Mrs. Santos' physical condition, including pain/suffering immediately after the incident.

15. Pilot  
CHC Helicopter Team

Dispatched emergency team to defendant's place of business in order to transport Mrs. Santos to CHC. Has knowledge of Mrs. Santos' physical condition, including pain/suffering immediately after the incident.

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16. Frances Esguerra  
San Jose Village  
Tinian, MP 96952

The Housekeeper of Plaintiff's son Joseph.  
Has knowledge of pain and suffering and  
injuries of Plaintiff. She was physically  
present at Casino at time of incident, but did  
not witness the fall.

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17. Vivian Hofsneider  
Tinian Health Center

Arranged Plaintiff's evacuation by  
by helicopter from Tinian to Saipan.

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8  
18. Alice Hofsneider  
Tinian Health Center

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10  
Medical Record Custodian who has access  
to records concerning treatment Plaintiff  
received immediately after her fall.

11       B. Description of Relevant Document

12       1. Plaintiffs have already produced all documents, data compilations, and tangible  
13 things that are in its possession, custody and control as required by Rule 26(a) Fed.R.Civ.Pro.  
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15       2. CNMI Uniform Building Code Sec. 3306(i)Handrails.  
16  
17       3. Undated Statement by Joseph A. Santos, son of client, made to Robert J.  
18 O'Connor, Esq. (confidential/work product and protected by attorney-client privilege).

19       C. Computation of Damages

20       At the present time, Mrs. Santos is still undergoing medical treatment for the injuries she  
21 suffered in this incident. However, subject to update once additional information is available,  
22 Plaintiff has incurred the following damages up to the point of this disclosure:

23  
24       -for medical bills, \$44,965.94

25       -for attorney fees and costs pursuant to 2 CMC 7126(c), accrued as of July 30,  
26 2005 in the amount of \$71,514.00 and \$6,712.00 respectively

27       -for alteration of Mrs. Santos' home to accommodate a new business that she is  
28 no longer able to pursue, \$20,000.00

1 -for housekeeping services incurred as a result of her inability to perform such  
2 duties, \$1400.00 (from February to August of 2005)

3 -total present damages: \$144,591.94

4 Additionally, Mrs. Santos will incur the following damages in the future  
5

6 -for future psychological treatment \$19,950.00

7 -the amount for future medical treatment has not been determined, but will be  
8 disclosed to Defendants as soon as it is available

9 -for future housekeeping services that she will no longer be able to perform  
herself \$26,000.00

10 -total future damages \$45,950.00

12 -Total damages, both past and future: \$190,541.94  
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15 D. Insurance Agreement

16 Plaintiffs have been apprised of the insurance agreement between Defendants.  
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19 Dated: August 30, 2005.

20 O'CONNOR BERMAN DOTT'S & BANES  
21 Attorney for Plaintiffs

22 By: \_\_\_\_\_



23 DAVID G. BANES  
CNMI Bar ID No. F0171  
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